

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of the 2014 Wolf Creek Decommissioning)
Cost Study as Provided by Wolf Creek Nuclear)
Operating Corporation in Accordance with the) Docket No. 15-WCNE-093-GIE
Commission's Order in Docket Number 163,561-U on)
December 9, 1992, and the Commission's Order in)
Docket 13-WCNE-204-GIE on June 13, 2013.)

MOTION FOR PROTECTIVE ORDER

COMES NOW, Kansas City Power & Light Company ("KCP&L") and requests that the State Corporation Commission of the State of Kansas ("Commission") issue a Protective Order in this matter. In support of this Motion, KCP&L states:

1. Concurrently with the filing of this Motion, KCP&L is filing the Direct Testimony of Gregg N. Clizer for the purpose of recommending a rate of inflation appropriate for estimating the escalation of costs associated with decommissioning a nuclear facility such as the Wolf Creek Nuclear Generating Station ("Wolf Creek").

2. The Direct Testimony referenced above contains confidential and/or commercially sensitive material. Additionally, during the course of discovery and investigation throughout this proceeding, KCP&L anticipates that Commission Staff and intervenors may seek the production of documents and information from KCP&L that contain confidential, proprietary and/or commercially sensitive material, as defined in K.S.A. 66-1220a, K.S.A. 66-1233 and K.A.R. 82-1-221a. The public disclosure of such information would adversely impact the financial interests of KCP&L and/or the security of KCP&L's assets.

3. KCP&L requests that the Commission issue its standard Protective Order to govern this proceeding, in order to protect KCP&L and other parties who have been granted

intervention in this docket from disclosure of sensitive, proprietary and confidential information, and to facilitate the investigation of this matter.

4. KCP&L submits that the interest in maintaining the confidential status of qualifying material and avoiding the substantial competitive harm that otherwise would result to the parties outweighs any interest in disclosing the material to unauthorized parties or in proceedings unrelated to the Application. For these reasons, KCP&L requests that the Commission issue its standard Protective Order in this proceeding.

5. The Commission has substantial latitude in deciding when a Protective Order is appropriate and the degree of protection that is required. A Protective Order will enable the Commission to manage the discovery process in a manner that furthers the goal of full disclosure of relevant, non-sensitive information, while at the same time protecting participants from harm that could result from the disclosure of commercially sensitive information.

WHEREFORE, KCP&L respectfully requests that the Commission issue the requested Protective Order and that said Protective Order apply to all parties to this proceeding.

Respectfully submitted,

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**ATTORNEYS FOR
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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on this 3rd day of October, 2014, a true and correct copy of the above and foregoing was electronically served, hand-delivered or mailed, postage prepaid, to the below-named individuals:

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